

C A D W A L A D E R

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Application granted. SO ORDERED.

August 26, 2024

Dated August 27, 2024
New York, New York

/s/ John G. Koeltl
John G. Koeltl, U.S.D.J.

VIA ECF

The Hon. John G. Koeltl
Daniel Patrick Moynihan Courthouse
United States Courthouse
500 Pearl St
New York, New York 10007

Re: Leadenhall Capital Partners LLP et al v. Wander et al, No. 24-cv-3453 (JGK)

Dear Judge Koeltl:

We write on behalf of Defendants Advantage Capital Holdings LLC and Kenneth King (together, the “A-CAP Defendants”) in connection with the above-captioned matter and in accordance with Practice VI(A)(2) of Your Honor’s Individual Practices. At the request of Leadenhall,¹ we respectfully request the sealing of the exhibits filed in connection with the A-CAP Defendants’ Reply Memorandum of Law in Further Support of Their Application to Modify the Preliminary Injunction. That reply and accompanying papers are being electronically filed concurrently herewith, including sealed versions of those exhibits.

Specifically, at the request of Leadenhall, the A-CAP Defendants move to seal (1) Exhibit A to the Declaration of Jonathan Watkins, the entire May 7, 2021 Loan and Security Agreement; (2) Exhibit B to the Declaration of Jonathan Watkins, the May 7, 2021 Dorchester Receivables II LLC Pledge Agreement; (3) Exhibit C to the Declaration of Jonathan Watkins, the May 7, 2021 Insurety Agency Services LLC Pledge Agreement; (4) Exhibit D to the Declaration of Jonathan Watkins, the May 7, 2021 Signal SML 4 LLC Pledge Agreement; and (5) Exhibit E to the Declaration of Jonathan Watkins, the May 7, 2021 SPLCSS III LLC Pledge Agreement. The A-CAP Defendants take no position on whether these documents ought to be filed under seal.

¹ “Leadenhall” refers to Plaintiffs Leadenhall Capital Partners LLP and Leadenhall Life Insurance Linked Investments Fund PLC.

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The Hon. John G. Koeltl
August 26, 2024

On August 26, 2024, counsel for the A-CAP Defendants solicited the views of counsel for Leadenhall and counsel for the 777 Entity Defendants² regarding the necessity of sealing the above-referenced exhibits, in accordance with Practice VI(A)(2) of Your Honor's Individual Practices. Leadenhall requested that all of the exhibits be filed under seal. The 777 Entity Defendants did not object to Leadenhall's request. As such, the A-CAP Defendants submit this letter motion so as to allow Leadenhall the opportunity to move for a sealing order pursuant to Practice VI(A)(2). The A-CAP Defendants have notified Leadenhall that, within three days, it must file a letter explaining the need to seal or redact these documents.

Respectfully submitted,



Jonathan M. Watkins

JMW

cc: All Counsel of Record via ECF

² The "777 Entity Defendants" refers to all defendants except the A-CAP Defendants, Josh Wander, and Steven Pasko.